

I believe that our nations best interests would be served by incentives for wiring our nation with fiber-optic cable, and letting entertainment, telephone, data services, medical imaging, internet and other present and future technologies use this cable. In all but rural areas, such wideband cable would provide a secure, noise free and have allow each line to use the same sprectrum space. In high density urban areas, multiple fiber optic cables can be used with each cable providing unique users with unlimited electromagnetic spectrum because each cable can use the same frequencies in each separate cable. As competing television cable companies use the same frequencies but provide different programming, so can multiple fiber optic cables provide different users with different content. Users in isolated or sparsely populated areas served by electrical service alone would be better served by a microwave or satellite serivce for internet and other envisioned content of BPL. Users with telephone line service (ONLY) or power and telephone line service would be best served by dial-up or DSL over conventional (POTS) copper lines. If the Commission wishes to integrate wireless users, current microwave technology, or a new system designed with nodes similar to cellular telephone technology would be much more efficient of our electromagnetic resources.

Even with present Part 19 rules, it is not uncommon to hear emissions from low power radiators propagated by E and F layer ionospheric propagation. With the vastly increased numbers of users that would use BPL, this propagated radiation would result in increased interference to domestic and international users of our electromagnetic spectrum without the ability to use conventional direction finding or identification methods to contact the party responsible for the radiation.

Also, there are questions about security of communications and the enhanced possibilty of evesdropping by anyone able to park near a power line. Using fiber-optic, POTS, or DSL technology, although there is always a security risk, the access points are much more limited. (cf. the reduced security risk with cell of the cellular telephone network).

Although we now have means of satelllite and aircraft born survelance of radio communications, BPL's near field propagation will render domestic survelance more difficult. Some covert needs of communications can be unidirectional, but local BPL noise might very cover up a terrorist low power digital transmission.

Additionally, users such as FEMA, Civil Defense, and the Amateur Radio Serice would be called upon to respond to natural disasters in which the needed frequencies could not be notched out in a timely manner consistant with the immediate nature of distress and welfare communications.

I believe the Commission should DENY Docket -4-37 in its entirity, and institute a NPRM of a national fiber optic network.

Sincerely,

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